

CONFIDENTIAL

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

RECEIVED
Aug 14 11 35 AM '96
POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

Special Services Fees and Classifications) Docket No. MC96-3

OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
(OCA/USPS-31-38)
(August 14, 1996)

Pursuant to sections 25 and 26 of the Rules of Practice of the Postal Rate Commission, the Office of the Consumer Advocate hereby submits interrogatories and requests for production of documents. Instructions included with OCA Interrogatories 1-4 to the United States Postal Service dated June 19, 1996, are hereby incorporated by reference.

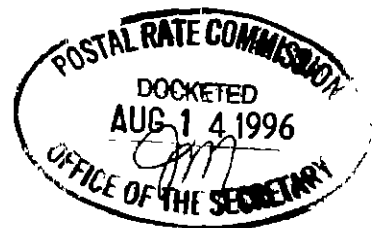
Respectfully submitted,



GAIL WILLETTE
Director
Office of the Consumer Advocate



DAVID RUDERMAN
Attorney



OCA/USPS-31. Please refer to the response to OCA/USPS-T5-13c and to the OCA's interrogatory at Tr. 1/55-58, June 1, 1994, in Docket No. R94-1.

- a. Interrogatory OCA/USPS-T5-13c asked for descriptions of changes to estimation formulas. The response mentioned changes to weighting factors, but not to the variance estimation formulas provided in R94-1 at Tr. 1/57-58. Please confirm that the R94-1 variance estimation formulas were used to produce Tables 4-6 of SSR-90. If you do not confirm, please detail all changes and provide updated variance formulas.
- b. In R94-1, C_k is defined as the cost associated with the k^{th} craft. Tr. 1/57. Please confirm that C_k was derived from payroll records for all employees of craft k in FY 1993. If you do not confirm, please explain.
- c. Please confirm that in R94-1, $C_{ik, \text{stratum}, \text{quarter}}$ was computed by the formula $C_{ik, \text{stratum}, \text{quarter}} = C_{k, \text{stratum}, \text{quarter}} * P_{ik, \text{stratum}, \text{quarter}}$. Tr. 1/58. If you do not confirm, please provide the correct formula.
- d. Please confirm that the formula provided in response to part (c) of this interrogatory is the formula used to compute $C_{ik, \text{stratum}, \text{quarter}}$ for the FY 1995 IOCS estimates provided in

Tables 4-6 of SSR-90. If you do not confirm, please explain and provide the correct formulas for FY 1995.

OCA/USPS-T-32. Please refer to pages 20-21 of SSR-22. This document lists possible values of entries for item F35 of the FY 1995 IOCS data set. In a review of the data set, it appears that item F35 can take the value "Z" in addition to the values listed on pages 20-21 of SSR-22. Please explain the significance of this value and any other item values not documented in SSR-22.

OCA/USPS-T-33. Please refer to item F262 (tally finance number) of the SSR-22 IOCS data set and the accompanying documentation.

- a. Please confirm that the tally finance number (item F263) has been suppressed or recoded. If you do not confirm, please explain why only a small number of unique finance numbers appear in this field. If you do confirm, please explain why these finance numbers had to be suppressed, considering that all sample finance number locations were listed in response to OCA/USPS-T5-15.
- b. Please confirm that F262 takes only values "xxxxxx" (for example "666666" or "777777") on the data file provided with

SSR-22. If you confirm, please explain the rationale for the various choices for "x".

OCA/USPS-34. Please refer to the attachment to the response to OCA/USPS-T5-15. The note on the last page indicates that six of the listed "offices either closed or the finance numbers associated with them were not used."

- a. For each of these six offices, please indicate whether the office closed or whether the associated finance number was not used for other reasons.
- b. For each finance number that was not used (and the office did not close) please explain why the office was excluded from the sample.

OCA/USPS-35. Please refer to the responses to OCA/USPS-T5-15 and OCA/USPS-T5-13. The attachment to OCA/USPS-T5-15 shows 1019 sampled offices (1025 less 6 that closed or were not used), and the response to OCA/USPS-T5-13 shows 1018 sample offices. Please explain this minor discrepancy.

OCA/USPS-36. Please refer to the response to OCA/USPS-T5-22. This response stated that a programming error caused incorrect

c.v. estimates to be produced for the Rural Carrier System in USPS-LR-G-127.

- a. Please provide a table of FY 1993 Rural Carrier System c.v.'s correcting the ones filed in G-127.
- b. If the corrected FY 1993 Rural Carrier System c.v.'s are still small relative to those of SSR-90, please explain any additional reasons that could account for the reliability decreases.
- c. Other than the discovered programming error, were there other changes to the estimation methodology (or to the sampling error estimation methodology) that could account for the difference in magnitude of sampling error reported?

OCA/USPS-T-37. Please refer to Tables 4-6 of USPS-LR-SSR-90.

- a. Please provide the programs used to produce the cost and c.v. estimates presented in these tables. If they have already been provided, please provide a citation to the appropriate MC96-3 library reference.
- b. Please confirm that the IOCS FY 1995 data file provided as USPS-LR-SSR-22 is the only input file required by the programs used to produce Tables 4-6 of SSR-90. If you do not confirm, please provide the additional files.

OCA/USPS-T-38. Please refer to Tables 7-10 of USPS-LR-SSR-90.

- a. Please provide the programs used to produce the proportions of total and corresponding c.v. estimates presented in these tables. If they have already been provided, please provide a citation to the appropriate MC96-3 library reference.
- b. Please confirm that the City Carrier Cost FY 1995 data file provided as library reference SSR-36 is the only input file required by the programs used to produce Tables 7-10 of SSR-90. If you do not confirm, please provide the additional files.

OCA/USPS-T-39. Please refer to Tables 11-12 of USPS-LR-SSR-90.

- a. Please provide the programs used to produce the cost and c.v. estimates presented in these tables. If they have already been provided, please provide a citation to the appropriate MC96-3 library reference.
- b. Please confirm that the Rural Carrier System FY 1995 data file provided as library reference SSR-36 is the only input file required by the programs used to produce Tables 4-6 of SSR-90. If you do not confirm, please provide the additional files.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with section 3.B(3) of the special rules of practice.

A handwritten signature in black ink, appearing to read "David Ruderman", is written above the printed name.

DAVID RUDERMAN
Attorney

Washington, D.C. 20268-0002
August 14, 1996